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1350 M. Street, N.W., Suite 1100
Washington, DC 20036

February 9, 1996

William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M St., NW
Washington, D.C. 20554

RECEIVED

FEB 9 1996

Re: EX PARTE PRESENTATION
CC Docket No. 95-116

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Mr. Caton:

Today, Warren Hannah, Mark Askins, Ron Havens, Marce Maatsch, Hoke Knox, and I, all of Sprint, met with Carol Matthey, Susan McMaster, Jason Karp, and Matthew Harthun, all of the Policy and Program Planning Division of the Common Carrier Bureau, to discuss local number portability. Sprint's comments focused on the need for a single point of implementation and were otherwise consistent with points raised in its pleadings in the above-captioned proceeding.

An original and one copy of this letter are being filed.

Sincerely,

Norina Moy
Director, Federal Regulatory
Policy and Coordination

cc: C. Matthey (w/o attachment)
S. McMaster (w/o attachment)
J. Karp (w/o attachment)
M. Harthun (w/o attachment)

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Number Portability

The Need for a Single Point of Implementation

Presented by Sprint

February 9, 1996

Number Portability

Scope of Discussion

- State Activities
- Developing State Conflicts
- Single Point of Implementation
- Risk Analysis
- Sprint's Proposal

Number Portability

State Activities

■ Illinois

- Location Routing Number Architecture
- Workshops in progress: SMS, Switching, Billing, Legal, Cost Recovery, Operations
- Stipulation expected first quarter 1996

2d Qtr. 1997

■ Maryland

- Workshops in progress - SMS, Legal, Switching

ATT
– LRN has been recommended

Number Portability State Activities

■ New York

- Commission ordered trials in ^{Carrier Port. Code} Manhattan and ^{MCI - CPC} Rochester (Feb., 1996 - July, 1996) ^{NY PUC recommended LRN}

■ Washington

- US. Intelco/Stratus trial completed
- Commission order for true number portability plan by 7/1/96 ^{closed report}

■ California

- Workshops in progress with Commission order expected first qtr 1996; RTP/LRN possible 4

initial done end of Jan.

proposing

Number Portability State Activities

■ Ohio

- Commission issued proposed rule to implement true number portability within one year of local competition

■ Georgia

- Workshops in progress with Commission order expected first qtr 1996; LRN recommended

■ Colorado and Wisconsin

- Commission activity has just started

Number Portability

Developing State Conflicts

- State Activities Have Led to Good Progress
 - Solid Framework in place for architecture discussions
 - LRN the primary architecture
- Each State Has its Own Agenda ✓
 - Evaluation of Framework, timeline and process
 - Workshops, meeting schedules

Number Portability Developing State Conflicts

- Same Industry Experts Involved in Each State
 - Positive for consistency
 - Negative for attendance and participation

Number Portability

Single Point of Implementation

- Single Set of Workshops Benefits the Implementation Process and Industry
 - Avoid administrative, organizational and scheduling conflicts
 - No state by state differences in implementation or operation
 - Can balance the need for single point of implementation with state involvement

Number Portability

Single Point of Implementation

- Number Portability is Inherently an Interstate Issue
 - Effects interoperability of networks
 - Multistate functions and companies involved
 - Number Administration directly impacted
 - Federal legislation
 - » interim portability solutions not sufficient
 - » true number portability needs to be addressed

Number Portability Risk Analysis

■ Potential Risks Without Single Point of Implementation

- Architectural differences: LRN, LANP, RTP
- Operational differences: maintenance, engineering, fault location
- Billing differences
- Hardware/Software differences (Host/Remote)
- Multistate functions and companies must interact with differences; i.e., operator services and support systems

Number Portability Risk Analysis

- Each Difference Adds to Network Complexity
 - Differences are inefficient
 - Increases in time and resource commitments will be necessary for implementation to ensure interconnection; impacts costs
 - Service could ultimately be effected
- A Single Point of Implementation Eliminates These Risks

Number Portability Sprint Proposal

- FCC Establish Workshop Issues That Need to be Addressed
 - SMS, Switching, Billing, Legal, Operational and Maintenance
- FCC Establish Date Certain Commitments For Specific Events and Workshop Completion
 - For example: SMS RFP completed by date certain

Number Portability Sprint Proposal

- Each State Involved Leads a Workshop Issue
 - Maryland: Legal
 - Illinois: Architecture
- One Centralized Entity Should Oversee the Efforts of All Workshop Activity
 - More efficient organization and administration
 - Possibly NANC, INC, or another representative committee

Number Portability Sprint Proposal

- Implementation Could Then be Phased in on a Nationwide Basis
- Sprint's Proposal Makes Best Use of States' Efforts While Balancing the Need for a Single Point of Implementation

February 9, 1996

**Local Number Portability
Single Point of Implementation
Sprint Proposal**

The following outlines Sprint's proposal for a local number portability single point of implementation with examples noted:

- 1) FCC should establish all of the issues for workshops to address.

Example:

- Administrative Oversight
- SMS
- Switching
- Billing
- Legal
- Operations and Maintenance

- 2) To balance state involvement with the need to implement a single nationwide solution for number portability, one state should be responsible for each workshop.

Example:

- Administrative Oversight - NANC, INC, or another representative committee
- SMS and Switching - Illinois
- Billing - Georgia
- Legal - Maryland
- Operations and Maintenance - California

- 3) FCC should establish date certain commitments for each workshop to meet a nationwide phased in implementation schedule. For example, if the top 100 MSAs are to be implemented with local number portability within two years, then workshop issues need to be completed to meet this timeline. Each workshop should be required to submit monthly status reports to the Administrative Oversight Workshop which should in turn keep the FCC and entire industry informed on progress.

Example:

- Implement number portability in top 100 MSAs by 1/1/98
- Switch vendors need to meet specifications by 10/1/97 to allow for testing
- Billing issues should be addressed by 10/1/97 to allow for testing
- SMS vendor needs to be chosen by 6/1/96

Each workshop should be required to develop an action plan and timeline in their first meeting to identify critical paths and milestones for status reporting.

Since activity has already taken place in several states, it would be best to make use of the multiple resources underway to implement number portability. Sprint believes this proposal serves as an organizational and administrative tool rather than a slow down to progress.